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Attorneys for Defendant  
BROADSPECTRUM DOWNSTREAM SERVICES,  
INC., formerly TIMEC COMPANY, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

KEVIN WOODRUFF, on behalf of himself  
and classes of those similarly situated,

Plaintiffs,

vs.

BROADSPECTRUM DOWNSTREAM  
SERVICES, INC., formerly TIMEC  
COMPANY, INC., a corporation,

Defendant.

CASE NO. 3:14-CV-04105-EMC

**STIPULATION AND ~~PROPOSED~~  
PROTECTIVE ORDER ADDING  
CHEVRON TO EXISTING PROTECTIVE  
ORDER (ECF 31)**

1 This Agreement is entered into by and between the undersigned attorneys on behalf  
2 of their respective clients, Kevin Woodruff on behalf of himself and classes of those similarly  
3 situated (“Plaintiffs”) and Broadspectrum Downstream Services, Inc. formerly Timec Company, Inc.  
4 (“Defendant” or “Broadspectrum”). There is currently in place a Protective Order covering the  
5 production and copying of documents and testimony in depositions (ECF No. 31 filed February 13,  
6 2015).

7 Plaintiff has requested that Broadspectrum produce copies of Chevron Refinery  
8 Manuals in Broadspectrum’s possession which Chevron considers confidential. Chevron has  
9 requested to be afforded the protections of the Protective Order currently in place with respect to the  
10 materials being produced by Broadspectrum, including that “the parties may first meet and confer  
11 prior to the filing of [Chevron] Confidential Material as to whether or not the Parties should request  
12 that the Confidential Material be filed under seal”, and prompt notification if the material is  
13 subpoenaed or subject to a document request in other litigation (ECF No. 31, p. 3, ll. 13-18, 23-28).  
14 The parties agree that any Chevron Confidential documents which Defendant produces in discovery  
15 will be treated as Confidential under the terms of the protective order currently in place (ECF No.  
16 31). Furthermore, pursuant to the notification and meet and confer provisions of the Protective  
17 Order with regard to documents marked “Chevron Confidential”, Plaintiff and Defendant agree to  
18 communicate with Chevron counsel listed below, in addition to the other party in this case.

19 In the event any third parties serve a subpoena or document request in other litigation  
20 to a party holding Chevron Confidential material in this case, the parties subject to the subpoena or  
21 document request will promptly notify the other party that produced the Confidential material to  
22 allow that party to file objections or otherwise attempt to prevent disclosure of the Confidential  
23 material to the third party, and will not produce the Confidential material to the third party until  
24 legally required to do so. The party subject to the subpoena or document request will also promptly  
25 notify Chevron counsel below for the same purpose. Chevron will have all protections and  
26 responsibilities of the parties set forth in ECF No. 31.

27 Chevron counsel to be notified is Nicholas Gallo, Chevron Corporation, 6001  
28 Bollinger Canyon Road, San Ramon, California 94583; telephone (510) 242-5580; facsimile (925)

Firmwide:140400529.5 052001.1047

842-2501; Email: ngallo@chevron.com.

DATED: May 18, 2016

/s/ Robert L. Zaletel

LINDBERGH PORTER  
ROBERT L. ZALETEL  
LITTLER MENDELSON, P.C.

Attorneys for Defendant  
BROADSPECTRUM DOWNSTREAM  
SERVICES, INC., formerly TIMEC  
COMPANY, INC.

DATED: May 18, 2016

/s/ John T. Mullan

JAY T. JAMBECK  
LEIGH LAW GROUP

JOHN T. MULLAN  
RUDY, EXELROD, ZIEFF & LOWE LLP

Attorneys for Plaintiffs  
KEVIN WOODRUFF, on behalf of himself and  
classes of those similarly situated

**[PROPOSED] ORDER**

For good cause appearing IT IS SO ORDERED.

DATED: May 18, 2016



DISTRICT COURT JUDGE